

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

EDWARD GRUNAUER,)	
)	
)	Case No. 08 C 1430
Plaintiff,)	
)	Judge Shaudr
vs.)	
)	
Komatsu Forklift U.S.A. and Automobile)	
Mechanics Local 701,)	
)	
Defendant)	

DEFENDANT'S MOTION FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD

Defendant, Automobile Mechanics Local 701 ("Local 701"), by and through its attorneys, Jacobs, Burns, Orlove, Stanton & Hernandez, hereby move for a fourteen (14) day extension of time to answer or otherwise plead in response to Plaintiff's First Amended Complaint. In support of this motion, Local 701 states as follows:

1. The Complaint in the above-captioned matter was filed on March 10, 2008. On information and belief, Local 701 was served on or around March 20, 2008 with the Complaint although the District Court's docket does not reflect a service of summons for Local 701. Plaintiff filed his First Amended Complaint on March 17, 2008. It is not clear when Local 701 received the Plaintiff's First Amended Complaint.
2. Defendant Local 701 requires additional time to investigate the allegations contained in the First Amended Complaint.
3. Defendant Local 701 believes that, with additional time to investigate the allegations, it can file an Answer and or other responsive pleading by April 23, 2008, in

advance of the April 28, 2008 status hearing.

4. On April 9, 2008, Defendant 701's counsel contacted Plaintiff's counsel to request additional time but was unable to reach him.

WHEREFORE, Defendant Local 701 respectfully requests a fourteen (14) day extension of time to answer or otherwise plead, from April 9, 2008 to April 23, 2008.

Respectfully submitted,

/Sherrie E. Voyles
One of Defendant's Attorneys

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